

Exhibit A

Proposed Order

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**This filing relates to ERS and
COFINA.**

ORDER GRANTING THREE HUNDRED SEVENTY-FIRST OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO AND THE PUERTO RICO SALES TAX FINANCING CORPORATION TO CROSS-DEBTOR DUPLICATE CLAIMS

Upon the *Three Hundred Seventy-First Omnibus Objection (Non-Substantive) of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico and the Puerto Rico Sales Tax Financing Corporation to Cross-Debtor Duplicate Claims* [ECF No.

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA", and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the "Debtors") (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

17936] (the “Three Hundred Seventy-First Omnibus Objection”)² filed by the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) and the Puerto Rico Sales Tax Financing Corporation (“COFINA,” and together with ERS, the “Debtors”) by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), dated August 20, 2021, for entry of an order disallowing in their entirety certain claims filed against ERS, as more fully set forth in the Three Hundred Seventy-First Omnibus Objection and the supporting exhibits thereto; and the Court having jurisdiction to consider the Three Hundred Seventy-First Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Three Hundred Seventy-First Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims filed against ERS identified in the column titled “Claims to Be Disallowed” in Exhibit A to the Three Hundred Seventy-First Omnibus Objection (collectively, the “Claims to Be Disallowed”) being duplicative of claims asserted against the Commonwealth of Puerto Rico (the “Commonwealth”), for which the asserted liability would lie, if at all, against the Commonwealth, not the Debtors; and the Court having determined that the relief sought in the Three Hundred Seventy-First Omnibus Objection is in the best interest of the Debtors, its creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Three Hundred Seventy-First Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Three Hundred Seventy-First Omnibus Objection.

ORDERED that the Three Hundred Seventy-First Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that the Debtors' right to object to the Remaining Claims is reserved; and it is further

ORDERED that Prime Clerk is authorized and directed to delete the Claims to Be Disallowed from the official claims register in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 17936 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Three Hundred Seventy-First Omnibus Objection

Three Hundred and Seventy-First Omnibus Objection
Exhibit A - Claims to Be Disallowed

CLAIMS TO BE DISALLOWED

REMAINING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
1	AGOSTO RODRIGUEZ, HILDA HC-01 BOX 7017 AGUAS BUENAS, PR 00703	06/21/21	17 BK 03566-LTS / Employees Retirement System of the Government of the Commonwealth of Puerto Rico	179412	\$ 60,000.00*	AGOSTO RODRIGUEZ, HILDA HC-01 BOX 7017 AGUAS BUENAS, PR 00703	06/21/21	17 BK 03283-LTS / Commonwealth of Puerto Rico	179399	\$ 60,000.00*
Reason: Duplicate liability filed against Debtor Employees Retirement System of the Government of the Commonwealth of Puerto Rico. All asserted liabilities, if any would be between the Claimant and the Commonwealth of Puerto Rico.										
2	RENTAS, RAFAEL 4844 CALLE LANCEODA PONCE, PR 00728	04/11/19	17 BK 03284-LTS / Puerto Rico Sales Tax Financing Corporation (COFINA)	168446	\$ 1,000.00*	RENTAS, RAFAEL 4844 CALLE LANCEODA PONCE, PR 00728	08/18/19	17 BK 03567-LTS / Puerto Rico Highways and Transportation Authority	170237	\$ 1,000.00*
Reason: Duplicate liability filed against Debtor Puerto Rico Sales Tax Financing Corporation (COFINA). All asserted liabilities, if any would be between the Claimant and the Puerto Rico Highways and Transportation Authority.										
3	RENTAS, RAFAEL JOSEY ANN RODRIGUEZ 609 AVE CASTRO, STE 102 PONCE, PR 00716	08/11/19	17 BK 03284-LTS / Puerto Rico Sales Tax Financing Corporation (COFINA)	170128	\$ 1,000.00*	RENTAS, RAFAEL 4844 CALLE LANCEODA PONCE, PR 00728	08/18/19	17 BK 03567-LTS / Puerto Rico Highways and Transportation Authority	170237	\$ 1,000.00*
Reason: Duplicate liability filed against Debtor Puerto Rico Sales Tax Financing Corporation (COFINA). All asserted liabilities, if any would be between the Claimant and the Puerto Rico Highways and Transportation Authority.										
4	RENTAS, RAFAEL JOSEY ANN RODRIGUEZ TORRES,ESQ. 609 AVE TITO CASTRO SUITE 102, PMB504 PONCE, PR 00716	08/12/19	17 BK 03284-LTS / Puerto Rico Sales Tax Financing Corporation (COFINA)	170129	\$ 1,000.00*	RENTAS, RAFAEL 4844 CALLE LANCEODA PONCE, PR 00728	08/18/19	17 BK 03567-LTS / Puerto Rico Highways and Transportation Authority	170237	\$ 1,000.00*
Reason: Duplicate liability filed against Debtor Puerto Rico Sales Tax Financing Corporation (COFINA). All asserted liabilities, if any would be between the Claimant and the Puerto Rico Highways and Transportation Authority.										
5	RENTAS, RAFAEL JOSEY A. RODRIGUEZ, ESQ. PO BOX 310121 MIAMI, FL 33231	08/18/19	17 BK 03566-LTS / Employees Retirement System of the Government of the Commonwealth of Puerto Rico	170241^	\$ 1,000.00*	RENTAS, RAFAEL 4844 CALLE LANCEODA PONCE, PR 00728	08/18/19	17 BK 03567-LTS / Puerto Rico Highways and Transportation Authority	170237	\$ 1,000.00*
Reason: Duplicate liability filed against Debtor Employees Retirement System of the Government of the Commonwealth of Puerto Rico. All asserted liabilities, if any would be between the Claimant and the Puerto Rico Highways and Transportation Authority.										

[^] Claim #170241 also contained on Exhibit A to the 374th Omnibus Claims Objection for Claims to Be Disallowed

Three Hundred and Seventy-First Omnibus Objection
Exhibit A - Claims to Be Disallowed

CLAIMS TO BE DISALLOWED

REMAINING CLAIMS

NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
6 RENTAS, RAFAEL JOSEY A. RODRIGUEZ, ESQ P.O. BOX 310121 MIAMI, FL 33231	08/18/19	17 BK 03284-LTS / Puerto Rico Sales Tax Financing Corporation (COFINA)	170238	\$ 1,000.00*	RENTAS, RAFAEL 4844 CALLE LANCEODA PONCE, PR 00728	08/18/19	17 BK 03567-LTS / Puerto Rico Highways and Transportation Authority	170237	\$ 1,000.00*
Reason: Duplicate liability filed against Debtor Puerto Rico Sales Tax Financing Corporation (COFINA). All asserted liabilities, if any would be between the Claimant and the Puerto Rico Highways and Transportation Authority.									
7 RODRIGUEZ RODRIGUEZ, LAURA P.O. BOX 303 AGUAS BUENAS, PR 00703	06/21/21	17 BK 03566-LTS / Employees Retirement System of the Government of the Commonwealth of Puerto Rico	179408	\$ 50,000.00*	RODRIGUEZ RODRIGUEZ, LAURA P.O. BOX 303 AGUAS BUENAS, PR 00703	06/21/21	17 BK 03283-LTS / Commonwealth of Puerto Rico	179409	\$ 50,000.00*
Reason: Duplicate liability filed against Debtor Employees Retirement System of the Government of the Commonwealth of Puerto Rico. All asserted liabilities, if any would be between the Claimant and the Commonwealth of Puerto Rico.									
8 SERRANO COLON, LUZ DIVINA P.O. BOX 439 AGUAS BUENAS, PR 00703	06/21/21	17 BK 03566-LTS / Employees Retirement System of the Government of the Commonwealth of Puerto Rico	179411	\$ 60,000.00*	SERRANO COLON, LUZ DIVINA PO BOX 439 AGUAS BUENAS, PR 00703	06/21/21	17 BK 03283-LTS / Commonwealth of Puerto Rico	179410	Undetermined*
Reason: Duplicate liability filed against Debtor Employees Retirement System of the Government of the Commonwealth of Puerto Rico. All asserted liabilities, if any would be between the Claimant and the Commonwealth of Puerto Rico.									